

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

AVEMARIA THOMPSON,

Plaintiff

- against -

**THOMAS J. SPOTA, ROBERT EWALD, and,
SUFFOLK COUNTY,**

Defendants.

Case No. 14-CV-02473(JAM)(AKT)

**NOTICE OF MOTION TO
PERMANENTLY SEAL CERTAIN
RECORDS AND INFORMATION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated June 8, 2018, the Declaration of Mary Ellen Donnelly, dated June 8, 2018, and all of the Exhibits submitted herewith, Individual Defendants, Thomas J. Spota and Robert Ewald, will and does move this Court before the Honorable A. Kathleen Tomlinson, United States Magistrate Judge for the United States District Court for the Eastern District of New York, Courtroom 910, United States District Court, 100 Federal Plaza, Central Islip, New York 11722, at a date and time to be designated by the Court, for an order pursuant to Federal Rules of Civil Procedure 5.2, to permanently seal Exhibits 16 and 22 to the Declaration of Plaintiff's counsel Jason Solotaroff [Docket No. 88] ("Solotaroff Declaration"), and the private and identifying information in Plaintiff's Opposition to Defendants' Motion for Summary Judgement [Docket No. 92], and for such further relief as this Court deems just and proper.

Specifically, Individual Defendants seek an order to permanently seal from public view the following documents attached to the Solotaroff Declaration [Docket No. 88]:

- Exhibit 16 Entire document, containing notes, communications, memoranda, and disciplinary records of a former ADA, not a party to this action.
- Exhibit 22 Entire document, containing memorandum on disciplinary record and sexual harassment investigation of former ADA, not a party to this action.

Individual Defendants further seek an order redacting the following portions of Plaintiff's Memorandum of Law in Opposition to Defendants' summary judgment motion, that discuss the sensitive and private information contained in Exhibits 16 and 22:

Plaintiff's Memorandum Pages 10, 11, 13, 20, and 22
of Law in Opposition Footnotes 62 and 86
[Docket No. 92]

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, are to be served upon the undersigned on or before July 13, 2018.

Dated: New York, New York
June 8, 2018

PUTNEY, TWOMBLY, HALL & HIRSON LLP

By: /s/ RKK
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